DANIEL G. BOGDEN 1 United States Attorney District of Nevada 2 SUSAN CUSHMAN Assistant United States Attorney 3 501 Las Vegas Boulevard South **Suite 1100** 4 Las Vegas, Nevada 89101 702-388-6336 5 UNITED STATES DISTRICT COURT 6 DISTRICT OF NEVADA -oOo-7 UNITED STATES OF AMERICA, 8 Case No.: 2:16-cr-0030-JAD-CWH Plaintiff, 9 STIPULATION TO CONTINUE **SENTENCING** VS. 10 (Second Request) MARIA GUADALUPE HERNANDEZ-11 CORTES, Defendant. 12 13 14 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, 15 United States Attorney; Susan Cushman, Assistant United States Attorney, counsel for the United 16 States of America and Benjamin Durham, Esq., counsel for defendant, that sentencing in the 17 above-captioned matter currently scheduled to commence on Monday, February 27, 2017, at 18 10:00 a.m. be vacated and continued to a date and time convenient to all parties, but no earlier 19 than 60 days. 20 This Stipulation is entered into for the following reason: 21 1. The government needs additional time to determine whether there will be a 22 recommendation for a two-level reduction in the defendant's base offense level for a group plea 23 pursuant to *United States v. Caro*, 997 F.2d 657 (9th Cir. 1993). 24

1	2. The parties agree to the continuance.	
2	3. The defendant is not in custody and does not object to the continuance.	
3	 4. This is the second request to continue the sentencing. DATED this <u>23rd</u> day of February 2017. 	
4		
5	Respectfully submitted,	
6	DANIEL G. BOGDEN	
7	United States Attorney /s/ Susan Cushman	
8 9	SUSAN CUSHMAN	
10	Assistant United States Attorney	
11	/s/ Benjamin Durham	
12	BENJAMIN DURHAM Counsel for Defendant	
13		
14		
15		
16		
17		
18 19		
20		
21		

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,) Case No.: 2:16-cr-0030-JAD-CWH
Plaintiff, vs.) ORDER TO CONTINUE) SENTENCING)
Defendant.))

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby orders that sentencing in the above-captioned matter be vacated and continued until May 16, 2017 at the hour of 9:00 a.m.

DATED this 23rd day of February, 2017.

UNITED STATES DISTRICT JUDGE